

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION

SCOTT PAPER LTD.,)
)
Plaintiff,)
)
vs.) Civil Action No. AMD 02-1980
)
AGM ALTERNATIVES, INC.,)
)
Defendant.)

MOTION TO REOPEN ACTION TO ENTER FINAL JUDGMENT

Plaintiff, Scott Paper Ltd., respectfully moves this Court, pursuant to Local Rule 111 and this Court's Settlement Order dated April 1, 2003 ("Order"), to reopen this action and enter the Final Judgment on Consent ("Final Judgment"), a true and accurate copy of which is attached hereto as Exhibit A. The grounds for this motion are that this action must be reopened to enter the Final Judgment that the parties contemplated as a condition to settlement and dismissal of this action.

On April 1, 2003, the parties held a conference call with the Court and informed the Court that the action had been settled. The parties further informed the Court that settlement was contingent upon execution of the Final Judgment and a settlement agreement.

On the same day, the Court entered the Order in accordance with Local Rule 111. The Order provides that "[t]he entry of this Order is without prejudice to the right of

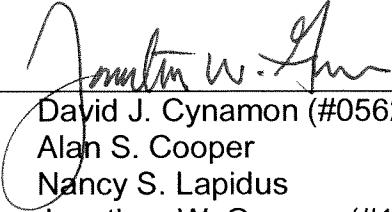
a party to move for good cause within 30 days to reopen this action. . . ." Thereafter, the parties executed the Final Judgment and a settlement agreement.

The settlement agreement signed by both parties contemplated the filing of the Final Judgment. Nonetheless, Plaintiff's counsel has contacted Defendant's counsel regarding the filing of this motion. Defendant's counsel has not responded.

It is believed that the grounds stated above constitute sufficient good cause supporting the reopening of this action for the limited purpose of entering the Final Judgment.

For the reasons stated above, Plaintiff requests that the Court reopen this action and enter the attached Final Judgment.

SCOTT PAPER LTD.

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